The St. Louis County Phase II Stormwater Management Plan (SWMP) was developed to improve area water quality by preventing harmful pollutants from being carried by stormwater runoff into local water bodies. The Metropolitan St. Louis Sewer District (MSD) partners with 59 municipalities (co-permittees) to comply with stormwater permit requirements for the St. Louis Metropolitan Small Municipal Separate Storm Sewer System (MS4).

Best Management Practices (BMPs) are methods to prevent or reduce the pollutants in stormwater runoff. The SWMP includes BMPs that address potential sources of pollutants in stormwater as required by the federal and state regulations. The implementation of BMPs in the SWMP will satisfy the six Minimum Control Measures (MCMs) required by the Phase II Regulations. Each MCM has a list of specific tasks. The six MCMs are as follows:

- 1. Public Education and Outreach
- 2. Public Involvement and Participation
- 3. Illicit Discharge and Elimination
- 4. Construction Site Stormwater Runoff Control
- 5. Post-Construction Stormwater Management
- 6. Pollution Prevention/Good Housekeeping for Municipal Operations

MCMs 1-3 are primarily the responsibility of MSD with each municipality's support. MCMs 4-6 are primarily the responsibilities of the municipality.

**MCM4** requires municipalities to create an ordinance or other mechanism to require sediment control BMPs at construction sites for projects with greater than 1 acre of land disturbance. This would add a land disturbance permit for these projects making inspections and compliance measures necessary. Municipalities can create their own land disturbance code and perform their own permitting and compliance, or they can contract with St. Louis County.

MCM5 requires municipalities to develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the permittee's regulated small MS4 (Per MSD Ordinance 12559). The program must ensure that controls are in place that will prevent or minimize water quality impacts by reasonably mimicking pre-construction runoff conditions on all affected new development projects and by effectively utilizing water quality strategies and technologies on all affected redevelopment projects to the maximum extent practicable. It is the municipality's responsibility to ensure developers include post-construction BMPs in the design plans and verify the developmental plans meet the applicable requirements. It is MSD's responsibility to review and approve the applicable projects.

**MCM6** is in regards to Pollution Prevention/Good Housekeeping for Municipal Operations. This MCM requires the permittee to develop and implement an operations and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations, including streets, parking lots, and vehicle maintenance areas, etc.

These MCMs are monitored and reported annually to MSD; MSD reports the progress of itself and each municipality as the coordinating authority for 60 co-permittees in St. Louis County, Missouri.